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April 24, 2025

Honorable Vera M. Scanlon (By ECF)
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom 13A South
Brooklyn, New York 11201

Re: Eisenberg v. New York City Department of Education, et al.
Docket No. 24-CV-01661 (HG)(VMS)

Dear Judge Scanlon:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and I represent Defendants in the above-referenced matter. Pursuant to Your Honor's April 21, 2025 Order granting the entry of a protective order and directing the parties to file a conforming copy, I write to inform the Court of an issue that has arisen regarding Plaintiff's position.

I edited the stipulation previously submitted by the parties to conform with the language changes made by the Court. Although Plaintiff previously signed and agreed to the terms of the proposed protective order, see Exhibit A attached, Plaintiff now indicates that he will not consent to entry of the conformed version of the stipulation. Plaintiff advised me that he will not agree to sign the order that he previously agreed to, with the Court's revisions, and requested that some additional provisions concerning other discovery issues be made part of the stipulation.

Defendants thus submit the conformed protective order in compliance with the Court's directive without Plaintiff's signature.

Respectfully submitted,

/s/ Shemori S. Corinthian

Shemori S. Corinthian

Assistant Corporation Counsel

Attachments

cc: Michael Eisenberg (Via ECF)
Plaintiff Pro Se